

REMARKS/ARGUMENTS

On pages 2-4 of the Office Action, claims 314, 316-318, 320, 325, 330, 336-339, 341, 342, 344, 349, 354, 356, 361-366, 372, 376, 377, 379, 383, 385-389, 395, 400, 402, 406, 408-412, and 438 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 5,462,488 to McKillip (the “McKillip patent”).

On pages 4-7 of the Office Action, claims 315, 321-324, 333-335, 340, 345-348, 357-359, 368-371, 380-382, 384, 391-394, 403-405, and 407 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over the McKillip patent in view of U.S. Patent No. 5,407,718 to Popat, et al. (the “Popat patent”).

On pages 7-8 of the Office Action, claims 328 and 398 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over the McKillip patent in view of U.S. Patent No. 5,622,758 to Hollis, et al. (the “Hollis patent”).

On pages 8-9 of the Office Action, claims 326, 327, 350, 351, 373, 374, 396, and 397 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over the McKillip patent in view of U.S. Patent No. 4,704,317 to Hickenbotham, et al. (the “Hickenbotham patent”).

The Invention

Before addressing the specific claim limitations, it will be helpful first to briefly summarize the invention of the pending claims.

The present invention resides in a sheet of printable business cards that includes a paper cardstock sheet and a continuous liner sheet directly and releasably secured to the paper cardstock sheet with ultraremovable adhesive. The sheet of printable business cards also includes continuous through-cut lines through the paper cardstock sheet but not through the continuous liner sheet. The continuous through-cut lines define at least in part perimeter edges of a printable business card in the paper cardstock sheet. The printable business card has a surface that is coupled to the ultraremovable adhesive. The

printable business card is configured to be removed from the continuous liner sheet, exposing the ultraremovable adhesive on the continuous liner sheet and the non-tacky printable business card's surface.

The present invention also resides in a sheet of printable business cards that includes a cardstock sheet and a continuous liner sheet directly and releasably secured to the cardstock sheet with ultraremovable adhesive. The sheet of printable business cards also includes continuous through-cut lines through the cardstock sheet but not through the continuous liner sheet. The continuous through-cut lines define at least in part perimeter edges of a printable business card in the cardstock sheet. The printable business card has a surface that is coupled to the ultraremovable adhesive. The printable business card is configured to be removed from the continuous liner sheet, exposing the ultraremovable adhesive on the continuous liner sheet and the non-tacky printable business card's surface.

Rejection of Claims 314, 316-318, 320, 325, 330, 336-339, 341, 342, 344, 349, 354, 356, 361-366, 372, 376, 377, 379, 383, 385-389, 395, 400, 402, 406, 408-412, and 438 Under 35 U.S.C. § 103(a) Based on the McKillip Patent

On pages 2-4 of the Office Action, claims 314, 316-318, 320, 325, 330, 336-339, 341, 342, 344, 349, 354, 356, 361-366, 372, 376, 377, 379, 383, 385-389, 395, 400, 402, 406, 408-412, and 438 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over the McKillip patent. Applicants have canceled claims 339, 341, 342, 344, 349, 354, 361-366, 372, 376, 377, 379, 383, 385-389, 395, 400, 402, 406, 408, 409, 411, 412, and 438. Applicants respectfully traverse this rejection of claims 314, 316-318, 320, 325, 330, 336-338, 356, and 410.

In col. 2, lines 49-51, the McKillip patent states that "[t]he at least one card member includes means for releasable detachment from the upper surface of the first layer of material" Also in col. 2, lines 57-60, the McKillip patent further states that "the means for releasable detachment of the at least one card member comprises laminate means operably applied to the bottom surface of the at least one card member"

Additionally, in col. 8, lines 15-18, the McKillip patent states that “[s]uch a laminate material is conventionally available and is typically constructed from polypropylene, polyethylene, polystyrene, or polyester.” In col. 8, lines 46-50, the McKillip patent states that “[a]s can be seen in FIG. 5 and FIG. 6, die-cutter 66 imparts a multi-directional score line 50 through the entire depth of second layer of material 24 . . . without cutting through the entire depth of the first layer of material 22.” Applicants note that FIG. 6 shows score line 50 entirely through laminate means 26. Applicants also note that in col. 8, lines 24-29, the McKillip patent states that “upper surface 37 of the first layer of material is . . . coated with adhesive means 28 . . . [and] [u]pper surface 37 . . . is then releasably attached to second surface 52 of laminate means 26 . . .” Furthermore, adhesive means 28 is shaded with a stippled pattern in FIG. 6. The same stippled pattern is also shown on top of the first layer of material 22 in FIG. 7 underneath the card member that is being removed; indicating that the adhesive means 28 is exposed. Accordingly, as taught in the McKillip patent, when a card member is removed from the business form, separation occurs between the adhesive means 28 and the releasably attached second surface 52 of laminate means 26. Thus, after the card member is separated from the adhesive means, the exposed surface of the card member in the McKillip patent is the second surface 52 of the laminate means 26.

Accordingly, the McKillip patent *fails* to teach or suggest “a continuous liner sheet *directly* and releasably secured to the *paper* cardstock sheet with ultraremovable adhesive . . . the printable business card is configured to be removed from the continuous liner sheet exposing the ultraremovable adhesive on the continuous liner sheet and the non-tacky printable business card’s surface,” as required by amended independent claim 314 (emphasis added).

On page 2 of the Office Action, the Examiner states that “McKillip discloses . . . a continuous liner sheet releasably secured with ultraremovable adhesive . . .” Applicants respectfully disagree with this statement.

With respect to ultraremovable adhesives, paragraph [0023], on page 9 of the originally filed specification, as filed states the following:

adhesions of "ultraremovable . . ." adhesives at their highest adhesion levels . . . are roughly half of what they are for conventional "removable" adhesive . . . A fundamental difference is that conventional adhesives provide complete contact with a substrate while ultraremovable adhesive [sic] provide partial contact. This limited contact area is what prevents an ultraremovable adhesive from becoming permanent, over time.

In col. 7, lines 37-40, the McKillip patent teaches "a pressure sensitive adhesive, such as an acrylic based permanent adhesive or a removable rubber based adhesive - although other types of *conventional* adhesives are also contemplated for use," (emphasis added). Thus, the McKillip patent is specifically teaching the use of conventional adhesives. Furthermore, nowhere does the McKillip patent expressly teach or suggest that the disclosed adhesive means 28 only partially contacts the back side of the cardstock. Accordingly, the McKillip patent *fails* to teach or suggest "a continuous liner sheet directly and releasably secured to the paper cardstock sheet with *ultraremovable adhesive*," as required by amended independent claim 314 (emphasis added).

On pages 9 and 10 of the Office Action, the Examiner states:

regarding the limitation(s) "the ultraremovable adhesive providing partial contact with the cardstock sheet construction and the partial contact preventing the ultraremovable adhesive from becoming permanent over time", the Examiner has given the term(s) the broadest reasonable interpretation(s) consistent with the written description An adhesive that is peeled off with the paper waste strips and providing a clean back to the cardstock sheet is considered to provide partial contact. McKillip discloses that top layer 24 is adhesively adhered to layer 26 . . . and that it includes [sic] a deadener . . . , so that the adhesive is peeled off with the paper waste strips/liner Applicant has fails [sic] to specifically point out how the adhesive with deadener differs from an ultraremovable adhesive. An ultraremovable adhesive is considered to be an adhesive that is peeled off with the paper waste strips and providing a clean back to the cardstock sheet."

Applicants respectfully disagree with the Examiner's overly broad interpretation.

First, Applicants' specification compares ultraremovable adhesives to conventional adhesives when stating "conventional adhesives provide complete contact with a substrate while ultraremovable adhesive [sic] provide partial contact . . . [t]his limited contact area is what prevents an ultraremovable adhesive from becoming permanent, over time," see paragraph [0023], on page 9 of the specification as filed. The Examiner's logic would suggest that coating a stripe of conventional adhesive would constitute a coating of an ultraremovable adhesive, which, respectfully, is simply not true. A stripe of conventional adhesive would still provide complete contact at the location adhered to the substrate, while a similar stripe of ultraremovable adhesive would only provide partial contact with the substrate.

Second, Examiner seems to equate the use of an adhesive deadener with providing partial contact to a substrate. Respectfully, this too is untrue. An adhesive deadener prevents any contact with the substrate, i.e., there is no contact between the adhesive and the substrate. Even the McKillip patent acknowledges this in col. 9, lines 31-35, stating that "those portions . . . which were precluded from attachment to bottom surface 45 . . . (as a result of the adhesive deadener) will be removed . . ." Thus, the McKillip patent acknowledges that the deadened adhesive does not adhere. Accordingly, the Examiner is erroneous in stating "that it includes [sic] a deadener . . . , so that the adhesive is peeled off with the paper waste strips/liner." The adhesive cannot be peeled off because it is not adhered. Accordingly, the McKillip patent does not even teach, much less support, the Examiner's erroneous statement that "[a]n ultraremovable adhesive is considered to be an adhesive that is peeled off with the paper waste strips and providing a clean back to the cardstock sheet."

On page 4 of the Office Action, the Examiner states that "[t]he ultraremovable adhesive is deemed to be a suspension polymer ultraremovable adhesive with a primer coat between the ultraremovable adhesive and the liner sheet (col. 7, lines 35-47)." Applicants have examined the cited paragraph in the McKillip patent and find no mention of "suspension polymer," "ultraremovable adhesive," or "primer coat," much less any related teaching or suggestion. It is well established that the Examiner first has the

burden of making a *prima facie* case of obviousness, which includes demonstrating that the applied reference(s) teach each any every element or feature claimed. The Examiner has not met this burden inasmuch as no showing has been made that the McKillip patent teaches an ultraremovable adhesive, much less, an ultraremovable suspension-polymer adhesive. Rather, the Examiner merely “deems” the adhesive disclosed in the McKillip patent to be an ultraremovable suspension-polymer adhesive without any support on the record for making such a determination. To be sure, the explicit disclosure of the McKillip patent is contrary to the Examiner’s conclusion, as previously discussed.

Accordingly, for at least the reasons presented above, the Applicants submit that the § 103(a) rejection of amended independent claim 314, and pending dependent claims 316-318, 320, 325, 330, 336-338, 356, and 410 is improper and should be withdrawn.

Rejection of Claims 315, 321-324, 333-335, 340, 345-348, 357-359, 368-371, 380-382, 384, 391-394, 403-405, and 407 Under 35 U.S.C. § 103(a) Based on the McKillip Patent and the Popat Patent

On pages 4-7 of the Office Action, claims 315, 321-324, 333-335, 340, 345-348, 357-359, 368-371, 380-382, 384, 391-394, 403-405, and 407 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over the McKillip patent in view of the Popat patent. Applicants have canceled claims 322, 323, 334, 340, 345-348, 357-359, 368-371, 380-382, 384, 391-394, 403-405, and 407. Applicants respectfully traverse this rejection of pending dependent claims 315, 321, 324, 333, and 335.

As discussed above, the McKillip patent *fails* to teach or suggest “a continuous liner sheet directly and releasably secured to the paper cardstock sheet with ultraremovable adhesive . . . the printable business card is configured to be removed from the continuous liner sheet exposing the ultraremovable adhesive on the continuous liner sheet and the non-tacky printable business card’s surface,” as required by amended independent claim 314.

On pages 4-5 of the Office Action, the Examiner states the following:

McKillip fails to disclose that [sic] the printable business cards being arranged in a grid, the grid including a column of printable business cards, and adjacent ones of the printable business cards in the column directly about one another and share a common edge or entire front faces of all of the printable business cards being free of any visible indicia.

On page 5 of the Office Action, the Examiner relies on the Popat patent to teach the following:

label sheets used for printing with personal computers . . . , facestock continuous through-cut lines . . . , the through-cut lines are deemed to define at least in part perimeter edges of printable business cards and a matrix waste portion . . . , [a]reas of the carrier sheet are positioned over the back sides of all the through-cut lines . . . , to allow the business cards to be removed and separated from the carrier sheet and from the matrix waste portions . . . [t]he die cuts also help facilitate ease of feeding into complex printer paths . . .

However, in col. 2, line 67, to col. 3, line 1, the Popat patent teaches “[e]ach label is provided with an adhesive layer 30 which permits the user to apply the label to another surface.” In col. 3, lines 6-11, the Popat patent teaches “label assembly 20 includes a label layer 40 having a pressure sensitive adhesive coating . . . mounted onto backing layer 28 . . . [t]his backing layer has a silicone release coating to permit easy removal of the mounted labels . . .” Thus, the Popat patent teaches *only* pressure sensitive adhesive labels with back side surfaces that are tacky. The Popat patent is silent with regard to ultraremovable adhesives. Accordingly, the Popat patent *fails* to teach or suggest “a continuous liner sheet directly and releasably secured to the paper cardstock sheet with ultraremovable adhesive . . . the printable business card is configured to be removed from the continuous liner sheet exposing the ultraremovable adhesive on the continuous liner sheet and the non-tacky printable business card’s surface,” as required by amended independent claim 314.

Accordingly, *neither* the McKillip patent, *nor* the Popat patent, *nor* the combination of the McKillip patent and the Popat patent teach or suggest “a continuous liner sheet directly and releasably secured to the paper cardstock sheet with ultraremovable adhesive . . . the printable business card is configured to be removed from

the continuous liner sheet exposing the ultraremovable adhesive on the continuous liner sheet and the non-tacky printable business card's surface," as required by amended independent claim 314. Therefore, Applicants submit that the § 103(a) rejection of dependent claims 315, 321, 324, 333, and 335, all of which depend from amended independent claim 314, is improper and should be withdrawn.

Rejection of Claims 328 and 398 Under 35 U.S.C. § 103(a) Based on the McKillip Patent and the Hollis Patent

On pages 7-8 of the Office Action, claims 328 and 398 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over the McKillip patent in view of the Hollis patent. Applicants have canceled dependent claim 398. Applicants respectfully traverse this rejection of dependent claim 328.

As discussed above, the McKillip patent *fails* to teach or suggest "a continuous liner sheet directly and releasably secured to the paper cardstock sheet with ultraremovable adhesive . . . the printable business card is configured to be removed from the continuous liner sheet exposing the ultraremovable adhesive on the continuous liner sheet and the non-tacky printable business card's surface," as required by amended independent claim 314.

On pages 7-8 of the Office Action, the Examiner relies on the Hollis patent to disclose that "a label sheet comprising a backing sheet . . . [t]he backing sheet has a leading edge and a trailing edge that extends out to form a narrow exposed strip extending the entire width of the liner sheet . . ."

In the abstract, the Hollis patent teaches that "[a] label applicator applies adhesive labels to opposite surfaces of a piece of a stock." In col. 6, lines 9-11, the Hollis patent teaches that "labels are rather weakly affixed to the backing sheet by respective thin layers 34 of a pressure sensitive adhesive." In col. 10, lines 10-12, the Hollis patent teaches that "label 3A . . . peels from the backing sheet 25 . . ." Also, in col. 10, lines 60-61, the Hollis patent teaches that "the file folder . . . contacts the adhesive layer 34 of the

label 3A . . .” Thus, the Hollis patent teaches *only* pressure sensitive adhesive labels with back side surfaces that are tacky. The Hollis patent is silent with regard to ultraremovable adhesives. Accordingly, the Hollis patent *fails* to teach or suggest “a continuous liner sheet directly and releasably secured to the paper cardstock sheet with ultraremovable adhesive . . . the printable business card is configured to be removed from the continuous liner sheet exposing the ultraremovable adhesive on the continuous liner sheet and the non-tacky printable business card’s surface,” as required by amended independent claim 314.

Accordingly, *neither* the McKillip patent, *nor* the Hollis patent, *nor* the combination of the McKillip patent and the Hollis patent teach or suggest “a continuous liner sheet directly and releasably secured to the paper cardstock sheet with ultraremovable adhesive . . . the printable business card is configured to be removed from the continuous liner sheet exposing the ultraremovable adhesive on the continuous liner sheet and the non-tacky printable business card’s surface,” as required by amended independent claim 314. Therefore, Applicants submit that the § 103(a) rejection of dependent claims 328, which depends from amended independent claim 314, is improper and should be withdrawn.

Rejection of Claims 326, 327, 350, 351, 373, 374, 396, and 397 Under 35 U.S.C. § 103(a) Based on the McKillip Patent and the Hickenbotham Patent

On pages 8-9 of the Office Action, claims 326, 327, 350, 351, 373, 374, 396, and 397 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over the McKillip patent in view of the Hickenbotham patent. Applicants have canceled dependent claims 350, 351, 373, 374, 396, and 397. Applicants respectfully traverse this rejection of dependent claims 326 and 327.

As discussed above, the McKillip patent *fails* to teach or suggest “a continuous liner sheet directly and releasably secured to the paper cardstock sheet with ultraremovable adhesive . . . the printable business card is configured to be removed from the continuous liner sheet exposing the ultraremovable adhesive on the continuous liner

sheet and the non-tacky printable business card's surface," as required by amended independent claim 314.

On pages 8-9 of the Office Action, the Examiner relies on the Hickenbotham patent to disclose "crushing the corner of labelstock for use in printers or copier [sic] to provide a diagonal path of relatively low stiffness . . ."

In col. 6, lines 9-12, the Hickenbotham patent describes FIG. 10 as showing "a labelstock 100 comprising a carrier web 101 to which is releasably adhered facestock 102 including an underlying pressure-sensitive adhesive layer 103." The Hickenbotham patent describes labels cut into the labelstock in Example 2 (see col. 6, lines 40-44). One skilled in the art would understand that labels resulting from the Hickenbotham patent's labelstock would have an exposed pressure-sensitive adhesive surface after they are removed from the carrier web, and thus, would have a back side surface that is tacky. The Hickenbotham patent teaches *only* pressure-sensitive adhesive labels. The Hickenbotham patent is silent with regard to ultraremovable adhesives. Accordingly, the Hickenbotham patent *fails* to teach or suggest "a continuous liner sheet directly and releasably secured to the paper cardstock sheet with ultraremovable adhesive . . . the printable business card is configured to be removed from the continuous liner sheet exposing the ultraremovable adhesive on the continuous liner sheet and the non-tacky printable business card's surface," as required by amended independent claim 314.

Accordingly, *neither* the McKillip patent, *nor* the Hickenbotham patent, *nor* the combination of the McKillip patent and the Hickenbotham patent teach or suggest "a continuous liner sheet directly and releasably secured to the paper cardstock sheet with ultraremovable adhesive . . . the printable business card is configured to be removed from the continuous liner sheet exposing the ultraremovable adhesive on the continuous liner sheet and the non-tacky printable business card's surface," as required by amended independent claim 314. Therefore, Applicants submit that the § 103(a) rejection of dependent claims 326 and 327, which depend from amended independent claim 314, is improper and should be withdrawn.

Conclusion

Applicants believe the amendments and arguments set forth herein place this application in condition for allowance. An early notice of allowance is respectfully requested. If for any reason the Examiner finds the application not in condition for a notice of allowance, the Examiner is requested to call the undersigned practitioner at the telephone number listed below to discuss steps to place the application into condition for allowance. Payment for fees due in connection with the filing of this Amendment is made via credit card. In the event of a payment deficiency, or if additional fees are due, please charge the fees to Avery Dennison's Deposit Account No. 013025.

Respectfully submitted,
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Dated: October 14, 2010 By: /Brian D. Martin - Reg. No. 47,771/
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